

THOMAS J. ORR
321 HIGH STREET
BURLINGTON, NJ 08016
tom@torrlaw.com
(609)386-8700
ATTORNEY FOR MADISON PLACE
CONDOMINIUM ASSOCIATION

In re

Lindsey Watson,

Debtor.

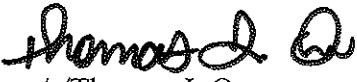
UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Chapter 13
Case No. 23-18441 (ABA)

APPLICATION IN SUPPORT OF CONSENT
ORDER RESOLVING PLAN OBJECTION AND
CURING POST PETITION ARREARS

Thomas J. Orr certifies as follows:

1. I represent Madison Place Condominium Association. The creditor is a community association servicing the debtor's property on Saxony Drive in Mt. Laurel, NJ.
2. On September 28, 2023, I filed an objection to the debtor's plan because it did not address pre-petition arrears.
3. I reached an agreement with debtor's counsel to allow the proof of claim to be bifurcated and to cure post-petition arrears outside the plan.
4. I certify that the statements made by me above are true. I am aware that if they are willfully false, I am subject to punishment.


/s/Thomas J. Orr
Thomas J. Orr

Dated: May 5, 2024